

Order No. 890 Transmission Planning Regional Technical Conferences—Midwest ISO Region, June 29, 2007

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Midwest Transmission Dependent Utilities
on MISO Strawman

Midwest TDUs

- ❑ Transmission Dependent Utilities in MISO Footprint
- ❑ Madison Gas & Electric, Midwest Municipal Transmission Group, Missouri Joint Municipal Electric Utility Commission, Missouri River Energy Services, Southern Minnesota Municipal Power Agency, Wisconsin Public Power Inc.
- ❑ MISO Transmission Customers and Transmission Owners
- ❑ Supporters of joint, regional and inclusive transmission planning and ownership

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MISO Strawman

Midwest ISO Strawman

- ❑ MISO strawman should be supplemented with a description of each TO's planning process and how it complies with Order 890.
 - We need to understand better what planning occurs today.
 - Compliance should not be excused based on claim that MISO is assuming local planning.
 - Without more, MISO strawman is deficient.
- ❑ Look to existing best practices, *e.g.*, Minnesota, Wisconsin.
- ❑ Involve stakeholders and customers.

Midwest TDUs on
MISO Strawman

Better understand existing planning.

- ❑ MISO responsible for “top down” long-term, regional planning. Individual TOs responsible for “bottom up” local planning.
- ❑ Some TOs have open, local planning and submitted strawmen. Others do local planning but submitted no strawman or other description of planning process.
- ❑ Without details on existing processes, difficult to determine whether proposed processes are non-discriminatory, especially those who purport to have incorporated local planning within the MISO process.
- ❑ Need more information to determine whether MISO and each TO’s planning process is compliant.
 - *E.g.*, comparability and economic planning principles require information on current practices.

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MISO's Assumption of Local Planning Is Not Compliance.

- ❑ Inconsistent with MISO TOA (Appendices B and H), which assigns to MISO planning responsibility only for facilities above 100 kV. TOs remain responsible for local planning.
- ❑ Is MISO equipped to perform local planning? Seems unworkable.
- ❑ Will TOs no longer engage in any planning? Seems untenable.
- ❑ MISO says that TOs that did not submit strawman will still submit plans.

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MISO's Assumption of Local Planning Is Not Compliance.

- ❑ Order 890 (P440): “To ensure full compliance, individual transmission owners must, to the extent they perform transmission planning within an RTO or ISO, comply with the Final Rule as well. Without such a requirement, the more regional RTO or ISO planning process will not comply with the requirements of the Final Rule to the extent they incorporate and rely on information prepared by underlying transmission owners that, in turn, have not complied with the Final Rule.

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MISO depends on TO-identified planning needs but missing details.

- “Openness” – Unknown whether all affected parties can be involved at both local and regional level.
 - “Transparency” – No written description of existing processes against which adequacy of proposed process can be judged.
 - “Comparability” – MISO process may provide comparability but unknown whether individual processes do.
- Midwest TDUs on
MISO Strawman

MISO depends on TO-identified planning needs but missing details.

- “Information exchange” – MISO provides no detail on process for obtaining information about point-to-point uses.
- “Regional coordination” – Little detail about PJM, TVA or SPP processes. Agreements are opaque.
- “Cost allocation” – Little to no information on cost allocation for local planning.

Best practices.

- ❑ Minnesota: Minnesota Biennial Transmission Planning Report Process, MAPP Subregional Planning Groups and CapX 2020.
- ❑ Wisconsin: American Transmission Company and Wisconsin PSC.
- ❑ Processes are open and inclusive.
- ❑ Processes are getting transmission constructed. (Joint ownership helps!)
- ❑ Model for all MISO TOs.

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Way forward.

- ❑ Supplement MISO strawman with appendix or description covering local planning.
 - Provide details on existing planning procedures.
 - Describe how 890 compliance achieved.
- ❑ Look to best practices in region.
- ❑ Involve customers and stakeholders in developing proposals before compliance deadline.
- ❑ Continue improving process after compliance.

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